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To: Meredith Laws

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Subject: Zinc Phosphide use classification - Errors in recent editions of 40 CFR

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Attachments: <u>ZPcorrect.pdf</u>

ZPwrong.pdf

The attached items document the correct and incorrect versions of the 152.175 table that have appeared in the 40 CFR pertaining to Zinc Phosphide.

The correct version appeared in the 40 CFR at least through the 1995 edition.

The incorrect version appeared at least as early as the 1998 edition and has appeared in all subsequent printings.

In the incorrect ("ZPwrong") version, the entries "All uses" and "Restricted" have disappeared from the row for "All dry formulations 60% and greater". As a consequence, the ditto ("do") notation for "All bait formulations ... Non-domestic outdoor uses (other than around buildings)" and "All dry formulations 10% and greater ... Domestic uses" refer up to "Unclassified" rather than to "Restricted". I have drawn circles on the versions to show where the correct text occurs on "ZPcorrect" and is missing from "ZPwrong".





ZPcorrect.pdf ZPwrong.pdf